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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
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COMMISSIONERS
JEFF HATCH-MILLER, CHAIRMAN
MARC SPITZER
WILLIAM A. MUNDELL
MIKE GLEASON
KRISTEN K. MAYES

IN THE MATTER OF THE APPLICATION FOR EXTENSION OF WATER UTILITY OF GREATER TONOPAH, INC., AN ARIZONA CORPORATION FOR AN EXTENSION OF ITS CERTIFICATE OF CONVENIENCE AND NECESSITY TO ENCOMPASS ALL OR PORTIONS OF SECTIONS 15, 17 AND 22, T2N, R5W, G&SRB&M, MARICOPA COUNTY, ARIZONA (AKA THE HASSAYAMPA RANCH DEVELOPMENT)	DOCKET NO. W-02450A-04-0837 **NOTICE OF COMPLIANCE FILING REGARDING COMPLIANCE WITH DECISION NO. 68307 (ARSENIC STANDARD)**

Water Utility of Greater Tonopah, Inc. ("WUGT") by and through its undersigned counsel, provides this notice of a compliance filing pursuant to Decision No. 68307. The Commission by Decision No. 68307 required WUGT to file, by June 30, 2006, with the Commission's Docket Control as a compliance item in this case, documents showing compliance with the new arsenic standard.

Attached hereto as Exhibit A, is a copy of the most recent compliance status report obtained from the Maricopa County Environmental Services Department ("MCESD ") for WUGT's public systems. All were issued in April 2006, after the new arsenic standard went into effect. In no instance does MCESD indicate any deficiencies with regard to the new arsenic standard. It should be noted, however, that under the Arizona Department of Environmental Quality ("ADEQ") directive relating to arsenic testing (attached as Exhibit B),

a company is actually given four (4) consecutive quarters to reach compliance once a tri-annual test exceeds the limit. Thus, it is WUGT's understanding that none of its system's will be deemed in violation of the new arsenic system until December 31, 2007 and then only if the average of the four (4) quarterly tests still exceeds the applicable MCL.

Attached as Exhibit C are copies of the most recent chemical analysis reports available to WUGT for its active wells for the Dixie, WPE #6, Garden City, Sunshine, B&D, Buckeye Ranch and Roseview water systems. Dixie, WPE #6 (with treatment) and Garden City all meet the current arsenic standard. The Sunshine, B&D, Buckeye Ranch and Roseview systems require additional treatment to satisfy the 0.01 standard. The status of WUGT's efforts to comply with the new arsenic standard is discussed more fully below.

1. Garden City. WUGT drilled a new well in 2005. The water quality meets or exceeds the new arsenic standard. The well is operational. No additional treatment is needed for this system.

2. Roseview (14 customers) and Tuft (7 customers). In September of 2005, WUGT submitted applications with the MCESD to approve a point of use (POU) compliance program for each of these systems. (Copies of the applications were provided to Commission Staff on September 9, 2005). WUGT has acquired the POU treatment devices. However, WUGT cannot move forward with the POU program until MCESD approval is secured. Even though WUGT filed its applications in

September of 2005, MCESD has yet to approve or reject the applications.[1]

3. WP#6. An activated alumina treatment plant has been installed. The water provided in this system now meets new arsenic standards, with treatment.

4. Buckeye Ranch/B&D. These systems were interconnected in 2004. The last test for arsenic (08/26/03 for Buckeye and 03/02/04 for B&D) indicate that the new arsenic standard will not be satisfied without treatment. WUGT is designing an adsorption treatment plant (AS:Xnp media) for this system. Additionally, WUGT must secure a special use permit before commencing any construction. An application for the special use permitted has been submitted and is pending with Maricopa County. WUGT has been informed that the special use permit may not be issued until early 2007. WUGT expects to have MCESD approval prior to issuance of the special use permit and be in a position to commence construction as soon as the special use permit is issued.

5. Sunshine Systems. WUGT intended to meet the new arsenic standard (as well as fire flow requirements) by constructing a pipeline to connect the Sunshine System with the Dixie system. The estimated cost for the

[1] WUGT understands the delay in approval is related to a dispute between ADEQ and MCESD regarding the appropriate components of a POU program (e.g., MCESD indicates separate engineering/installation drawings be developed specific to each POU location, while ADEQ indicates the manufacturer's installation instruction are adequate).

interconnection, however, doubled from $197,000 to over $ 400,000. The increased cost of the new line resulted in WUGT concluding its construction would be unreasonable and imprudent, and caused WUGT to re-evaluate its options. The Company has ordered a 100,000 gallon storage tank and is designing an adsorption treatment plant (AS:Xnp media) for the Sunshine System. A special use permit will now be required before WUGT can proceed with the installation of the treatment plant. Installation of the treatment facility is now targeted for mid 2007

6. Dixie. No action was necessary as the water quality has always met the current arsenic standard.

Potential for Change in the Standard's Application.

On March 2, 2006, the Environmental Protection Agency (the "EPA") solicited comments on proposed revisions to EPA's national affordability methodology for small drinking water systems and a methodology for determining if an affordable variance technology is protective of public health. Comments were due May 1, 2006. If the proposed rules are adopted by EPA and then implemented in Arizona, it is much more likely that WUGT could secure a variance or exemption from the new arsenic standard for some, if not all, of its affected systems.

Conclusion

The foregoing is submitted as full satisfaction of the compliance filing requirement established by Decision No. 68307.

If for any reason Staff determines that the foregoing does not fully satisfy the compliance filing requirement established by Decision No. 68307, then WUGT respectfully requests the deadline for filing be extended until and including December 31, 2007. Such an extension is appropriate because ADEQ's implementation guidance gives the WUGT until December 31, 2007 to become fully compliant with the new arsenic standard, because EPA is considering new rules which may affect the arsenic standard's applicability to some or all of the WUGT systems that otherwise require treatment to meet the new arsenic standard, and because WUGT is moving expeditiously to install appropriate treatment, but has been delayed due to cost increases and permitting requirements.

RESPECTFULLY SUBMITTED this 12th day of June, 2006.

CURTIS, GOODWIN, SULLIVAN,
UDALL & SCHWAB, P.L.C.

By: _____

William P. Sullivan
2712 North 7th Street
Phoenix, Arizona 85006-1003
Attorneys for Water Utility of Greater Tonopah

PROOF OF AND CERTIFICATE OF MAILING

I hereby certify that on this 13th day of June, 2006, I caused the foregoing document to be served on the Arizona Corporation Commission by delivering the original and thirteen (13) copies of the above to:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

COPY of the foregoing hand delivered
this 13th day of June, 2006 to:

Marc Stern, ALJ
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Christopher Kempley, Chief Counsel
Keith Layton, Assistant Counsel
Legal Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Ernest Johnson, Director
Utilities Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Mary Walker

1284\-5-3-1Pleadings\Compliance Filing(Arsenic).doc

EXHIBIT A

Maricopa County
Environmental Services Department

PUBLIC WATER SYSTEM COMPLIANCE STATUS REPORT

System Name: WUGT - Rose View Water Company
PWS ID#: 07-082

Type of System: Community Number of POE's: 1 Surface Water: N/A
Number of Service Connections: 20 Population Served: 50

Assigned Monitoring Dates - Initial: 1/1/02 Phase II: 1/1/02 Phase V: 1/1/02

Does the water system have a Certified Operator? Yes

Does the system have major treatment plant deficiencies? N/A
Please describe: ____

Date of last Sanitary Survey: November 15, 2005

Does the system have major O & M deficiencies? No
Please describe: ____

Does the system have water quality monitoring/reporting deficiencies? No
Please describe: ____

General Public Water System Compliance Status? **Compliant**

Date of compliance review: **April 7, 2006** By: **Doug Taylor R.S.** Initials: DT
Phone: **(602) 506-6831**

Requested By: Joyce Goodwin, Paralegal Fax Number/ Contact: 602-256-6800 Tracking Number: 1117

Supervisor Initials: [illegible] Date: 4/13/06

Drinking Water Program
John Kolman, Manager
1001 N. Central Ave., Suite 150Phoenix, Arizona 85004-1940 Phone: (602) 506-6666 Fax: (602) 506-6925

Maricopa County
Environmental Services Department

PUBLIC WATER SYSTEM COMPLIANCE STATUS REPORT

System Name: WUGT - Garden City Water Co.
PWS ID#: 07-037

Type of System: Community Number of POE's: 1 Surface Water: N/A
Number of Service Connections: 15 Population Served: 50

Assigned Monitoring Dates - Initial: 1/1/98 Phase II: 1/1/98 Phase V: 1/1/98

Does the water system have a Certified Operator? Yes

Does the system have major treatment plant deficiencies? N/A
Please describe: _____

Date of last Sanitary Survey: November 15, 2005

Does the system have major O & M deficiencies? No
Please describe: _____

Does the system have water quality monitoring/reporting deficiencies? No
Please describe: _____

General Public Water System Compliance Status? **Compliant**

Date of compliance review: **April 7, 2007** By: **Doug Taylor R.S.** Initials: DT
Phone: **(602) 506-6631**

Requested By: Joyce Goodwin, Paralegal Fax Number/ Contact: 602-256-6800 Tracking Number: 1119

Supervisor Initials: _____ Date: _____

Drinking Water Program
John Kolman, Manager
1001 N. Central Ave., Suite 150Phoenix, Arizona 85004-1940 Phone: (602) 506-6666 Fax: (602) 506-6925

Maricopa County
Environmental Services Department

PUBLIC WATER SYSTEM COMPLIANCE STATUS REPORT

System Name: WUGT - Sunshine Water Co.
PWS ID#: 07-071

Type of System: Community Number of POE's: 1 Surface Water: N/A
Number of Service Connections: 81 Population Served: 251

Assigned Monitoring Dates - Initial: 1/1/94 Phase II: 1/1/94 Phase V: 1/1/97

Does the water system have a Certified Operator? Yes

Does the system have major treatment plant deficiencies? No
Please describe: ____

Date of last Sanitary Survey: November 15, 2005

Does the system have major O & M deficiencies? No
Please describe: System has entered into a consent agreement to correct vioaltions..

Does the system have water quality monitoring/reporting deficiencies? No
Please describe: ystem has not submitted disinfection byproduct monitoring results. System has entered into a concent agreement to correct monitoring violation and must conitnue to meet requirements of consent agreement to remain in compliance.

General Public Water System Compliance Status? Compliant

Date of compliance review: April 7, 2006 By: Doug Taylor R.S. Initials: DT
Phone: (602) 506-6631

Requested By: Joyce Goodwin, Paralegal Fax Number/ Contact: 602-256-6800 Tracking Number: 1118

Supervisor Initials: [signature] Date: 4/10/06

Drinking Water Program
John Kolman, Manager
1001 N. Central Ave., Suite 150Phoenix, Arizona 85004-1940 Phone: (602) 506-6666 Fax: (602) 506-6925

Maricopa County
Environmental Services Department

PUBLIC WATER SYSTEM COMPLIANCE STATUS REPORT

System Name: WUGT - Dixie Water
PWS ID#: 07-030

Type of System: Community Number of POE's: 1 Surface Water: N/A
Number of Service Connections: 26 Population Served: 81

Assigned Monitoring Dates - Initial: 1/1/99 Phase II: 1/1/99 Phase V: 1/1/99

Does the water system have a Certified Operator? Yes

Does the system have major treatment plant deficiencies? N/A
Please describe: ____

Date of last Sanitary Survey: February 26, 2006

Sent Public Notice 4/13/06

Does the system have major O & M deficiencies? Yes
Please describe: System has not submitted October 2005 total coliform results, and had two positive total coliform results during November 2005. System needs to install disinfection technology.

Does the system have water quality monitoring/reporting deficiencies? No
Please describe: ____

General Public Water System Compliance Status? **Non-compliant, minor**

Date of compliance review: **April 7, 2006** By: **Doug Taylor R.S.** Initials: DT
Phone: **(602) 506-6631**

Requested By: Joyce Goodwin, Paralegal Fax Number/ Contact: 602-258-6800 Tracking Number: 121

Supervisor Initials: [signature] Date: 4/12/06

Drinking Water Program
John Kolman, Manager
1001 N. Central Ave., Suite 150Phoenix, Arizona 85004-1940 Phone: (602) 506-6666 Fax: (602) 506-6925

Maricopa County

Environmental Services Department

PUBLIC WATER SYSTEM COMPLIANCE STATUS REPORT

System Name: WUGT - WPE #6 (West Phoenix Estates #6)
PWS ID#: 07-733

Type of System: Community Number of EPDS's: 1 Surface Water: N/A
Number of Service Connections: 23 Population Served: 71

Assigned Monitoring Dates - Initial: 1/1/02 Phase II: 1/1/02 Phase V: 1/1/02

Does the water system have a Certified Operator? Yes

Does the system have major treatment plant deficiencies? No
Please describe: ____

Date of last Sanitary Survey: August 19, 2005

Does the system have major O & M deficiencies? No
Please describe: ____

Does the system have water quality monitoring/reporting deficiencies? Yes
Please describe: System operating status has been changed to substantial compliance. However, this status is contengent upon sucessful completion of the initial lead and copper monitoring as discused between system representatives and Mr. Taylor on April 24, 2006.

General Public Water System Compliance Status? **Substantial Compliance**

Date of compliance review: **April 25, 2006** By: **Doug Taylor R.S.** Initials: DT
Phone: **(602) 506-6631**

Requested By: File Fax Number/ Contact: 602-256-6800 Tracking Number: 1135
Supervisor Initials: Date: 4/26/06

Drinking Water Program
John Kolman, Manager
1001 N. Central Ave., Suite 150Phoenix, Arizona 85004-1940 Phone: (602) 506-6666 Fax: (602) 506-6925

Maricopa County
Environmental Services Department

PUBLIC WATER SYSTEM COMPLIANCE STATUS REPORT

System Name: WUGT - B & D Water Co.
PWS ID#: 07-618

Type of System: Community Number of EPDS's: 2 Surface Water: N/A
Number of Service Connections: 76 Population Served: 235

Assigned Monitoring Dates - Initial: 1/1/98 Phase II: 1/1/98 Phase V: 1/1/98

Does the water system have a Certified Operator? Yes

Does the system have major treatment plant deficiencies? N/A
Please describe: _____

Date of last Sanitary Survey: February 13, 2004

Does the system have major O & M deficiencies? No
Please describe: _____

Does the system have water quality monitoring/reporting deficiencies? Yes
Please describe: System has not performed nitrate monitoring for EPDS 002. Missed monitoring public notice is required.

Sent Lab results to ADEQ/MCES 4/12

General Public Water System Compliance Status? **Non-compliant, minor**

Date of compliance review: **April 11, 2206** By: **Doug Taylor R.S.** Initials: DT
Phone: **(602) 506-6631**

Requested By: Joyce Goodwin, Paralegal Fax Number/ Contact: 602-256-6800 Tracking Number: 1120

Supervisor Initials: [illegible] Date: 4/12/06

Drinking Water Program
John Kolman, Manager
1001 N. Central Ave., Suite 150Phoenix, Arizona 85004-1940 Phone: (602) 506-6666 Fax: (602) 506-6925

EXHIBIT B

ADEQ Arizona Department of Environmental Quality
Janet Napolitano, Governor
Stephen A. Owens, ADEQ Director

FACT SHEET

Arsenic Information For Arizona Public Water Systems

INTRODUCTION

In October 2001, the U.S. Environmental Protection Agency (EPA) announced its decision to lower the arsenic standard for public water systems from 0.05 mg/L to 0.010 mg/L (50 parts per billion (ppb) to 10 ppb, respectively). The effective date of the revised rule and new standard is January 23, 2006.

WHAT IS THE PURPOSE OF THIS NEW ARSENIC STANDARD?

The purpose of the new standard is to protect public health by reducing the occurrence of carcinogenic (e.g., lung and bladder cancers) and non-carcinogenic (e.g. skin damage, circulatory disorders, etc.) diseases that can result from unhealthful levels of arsenic exposure.

WHY MUST ARIZONA ENFORCE THE NEW ARSENIC STANDARD?

Arizona is a primacy state for purposes of implementing the federal Safe Drinking Water Act, which means the U.S. Environmental Protection Agency defers to Arizona to implement the Act. Arizona must enforce the new arsenic standard to maintain this primacy authority because the new arsenic standard is federal law.

WHERE DOES ARSENIC COME FROM AND HOW DOES IT GET INTO DRINKING WATER SOURCES?

In Arizona, the primary source of arsenic in drinking water occurs from the leaching and erosion into groundwater of natural arsenic deposits found in geologic features.

HOW WILL COMPLIANCE WITH THE NEW ARSENIC STANDARD BE DETERMINED?

Public water systems will not be considered in violation of the new arsenic standard until they have completed one year of quarterly sampling and the running annual average of those results exceeds 10 ppb. However, after January 23, 2006, the system will be immediately out of compliance if any quarterly sample result would cause the running annual average to exceed 10 ppb at any sampling point, that is, if any result is above 40 ppb. If a system does not collect all required samples, compliance will be based on the running annual average of the sample(s) collected.

HOW MANY PUBLIC WATER SYSTEMS IN ARIZONA ARE IMPACTED BY THE NEW ARSENIC STANDARD OF 0.010 MG/L (10PPB)?

The revised arsenic rule not only lowered the standard to 10 ppb, but it also applied the standard to non-transient, non-community water systems as well (e.g., stand alone schools, business, etc.). As such, roughly one third of the 1000 community and non-transient, non-community water systems in Arizona have at least one source of water not meeting the new arsenic standard.

WHEN DO WATER SYSTEMS NEED TO SAMPLE FOR ARSENIC UNDER THE REVISED RULES?

Public water systems should remain on their established inorganic contaminant (IOC) monitoring cycle. A public water system may contact ADEQ at (602) 771-4644 or toll free in state at (800) 234-5677, Ext. 771-4644 to verify its established monitoring cycle and initial monitoring year. Ground water entry points into the distribution system must be monitored for arsenic as follows:*

If the system's Initial Monitoring Year is 1993, 1996, 1999, 2002 or 2005, sample for arsenic in 2005. If the analytical results are equal to or less than 10 ppb, the system is not required to monitor again until 2008 because ADEQ will "grandfather" data gathered prior to January 23, 2006 that meets the new standard. If the analytical results are greater than 10 ppb, the system must sample again on, or after, January 23, 2006, but no later than March 31, 2007 because compliance must be determined by December 31, 2007, which is the end of the second compliance period.

If the system's Initial Monitoring Year is 1994, 1997, 2000, 2003 or 2006, sample for arsenic in 2006. The system must initiate compliance monitoring no later than December 31, 2006. If the system collects samples for the time frame of January 1, 2006 through January 22, 2006 and the analytical results are less than or equal to 10 ppb, the system is not required to monitor again until 2009 because ADEQ will "grandfather" data gathered prior to January 23, 2006 that meets the new standard. If the analytical results are greater than 10 ppb, the system must sample again on, or after, January 23, 2006, but no later than March 31, 2007

because compliance must be determined by December 31, 2007, which is the end of the monitoring cycle. If the system collects samples during the time frame of January 23, 2006 through December 31, 2006 and the analytical results are less than or equal to 10 ppb, the system is not required to monitor again until 2009. If the system collects samples during the time frame of January 23, 2006 through December 31, 2006 and the results are greater than 10 ppb, the water system must begin quarterly monitoring in the first quarter immediately following the routine sample.

If the system's Initial Monitoring Year is 1995, 1998, 2001, 2004 or 2007, sample for arsenic in 2007. The system must initiate compliance monitoring no later than March 31, 2007. If the analytical results are less than or equal to 10 ppb, the system is not required to monitor again until 2010. If the analytical results are greater than 10 ppb, the water system must begin quarterly monitoring in the second quarter of 2007 (April 1, 2007 through June 30, 2007).

Surface water entry points into the distribution system must monitor for arsenic as follows:*

In all cases, sample for arsenic in 2006. The system must initiate compliance monitoring no later than March 31, 2006, as compliance must be determined by December 31, 2006 and four quarters of monitoring may be required. If the analytical results are less than or equal to 10 ppb, the system is not required to monitor again for the remainder of 2006. If the analytical results are greater than 10 ppb, the water system must begin quarterly monitoring in the second quarter of 2006 (April 1, 2006 through June 30, 2006).

* Water systems participating in ADEQ's Monitoring Assistance Program (MAP) will not be required to conduct baseline (routine) monitoring on their own, as all baseline monitoring requirements for IOCs, including arsenic, are covered under MAP. However, increased compliance monitoring (e.g., quarterly sampling) is not covered by MAP.

WHAT ARE THE TREATMENT OPTIONS FOR IMPACTED WATER SYSTEMS AND WHO DO I CONSULT?

There are many treatment options available and allowed by rule for impacted water systems.

- Disconnection: Some systems have the option to simply disconnected unsuitable wells as they may not be needed to meet current system production demands.
- Source Rehabilitation: Systems also may have the option to rehabilitate existing wells and/or develop new sources in areas with less arsenic.
- Blending: Systems also may blend water from two or more sources to lower arsenic levels from a nonconforming source(s).
- Centralized Treatment: Various centralized treatment options are available including, but not limited to, ion exchange, adsorptive processes, filtration and reverse osmosis.
- Point-of-use (POU): POU treatment may be a viable option for smaller water systems and commonly include "under the sink" reverse osmosis technologies (please see Arizona Point of Use Compliance Program Guidance Manual available at www.azdeq.gov/environ/water/download/pointofuse.pdf).

Regardless of the treatment option selected, certain plan, engineering and/or permit review and approval requirements will apply.

CAN I GET AN EXTENSION FOR THE NEW ARSENIC STANDARD?

Yes, time extensions to meet the new arsenic standard are available, however it is important to note, water systems must be able to demonstrate that several conditions exist preventing them from meeting the applicable compliance dates in order to qualify. The specific time extension requirements can be found in Arizona Administrative Code (A.A.C. R18-4-111) or ADEQ's "Determining Compliance With the Revised Arsenic Standard" policy. In general, a water system that:

- demonstrates "compelling factors" that make it unable to comply with the new standard,
- is unable to make changes to comply with the new standard, and
- is taking "all practicable steps" to meet the new standard

may be elegible for an extension to January 23, 2009. Systems making the demonstration and serving less than 3,300 people may be granted an additional extension to January 23, 2015.

FOR MORE INFORMATION CONTACT:

ADEQ's Drinking Water Program
1110 W. Washington St.
Phoenix, AZ 85007
(602) 771-4644
toll free in-state at (800) 234-5677, Ext. 771-4644

Publication Number: FS 05-19

Groundwater Arsenic Sampling Scenario - Chart 1
Initial Monitoring Years of 1993, 1996, 1999, 2002 or 2005

First Compliance Cycle (1993 - 2001) Rule Finalized on January 23, 2001

Second 9-Year Compliance Cycle

1st Compliance Period			2nd Compliance Period			3rd Compliance Period		
2002	2003	2004	2005	2006	2007	2008	2009	2010

Sample for Arsenic in 2005.
If the analytical results are less than or equal to 0.010 mg/L, the system is not required to monitor again for the 3 year compliance period of 2005-2007.

If the analytical results are greater than 0.010mg/L for the samples collected in 2005, the water system must sample again after January 23, 2006, but no later than March 31, 2007.

Effective Date of Revised MCL January 23, 2006

Groundwater Arsenic Sampling Scenario - Chart 2
Initial Monitoring Years of 1994, 1997, 2000, 2003 or 2006

First Compliance Cycle (1993 - 2001) Rule Finalized on January 23, 2001

Second 9-Year Compliance Cycle

1st Compliance Period			2nd Compliance Period			3rd Compliance Period		
2002	2003	2004	2005	2006	2007	2008	2009	2010

Sample for Arsenic in 2006.
If the system collects samples in the time frame of January 1, 2006 through January 22, 2006 and the analytical results are less than or equal to 0.010 mg/L, the system is not required to monitor again in the three year compliance period of 2005–2007.
If the analytical results are greater than 0.010 mg/L, the system must sample again on or after January 23, 2006, but no later than March 31, 2007.

If the system collects samples in the time frame of January 23, 2006 through December 31, 2006 and the analytical results are less than or equal to 0.010 mg/L, the system is not required to monitor again for the three year compliance period of 2005–2007.
If the system collects samples in the time frame of January 23, 2006 through December 31, 2006 and the results are greater than 0.010 mg/L, the system must begin quarterly monitoring in the first quarter immediately following the routine sample.

Effective Date of Revised MCL January 23, 2006

Groundwater Arsenic Sampling Scenario - Chart 3
Initial Monitoring Years of 1995, 1998, 2001, 2004 or 2007

First Compliance Cycle (1993 - 2001) Rule Finalized on January 23, 2001

Second 9-Year Compliance Cycle

1st Compliance Period			2nd Compliance Period			3rd Compliance Period		
2002	2003	2004	2005	2006	2007	2008	2009	2010

Sample for Arsenic in 2007.
The system must initiate compliance monitoring no later than March 31, 2007. If the analytical results are greater than 0.010mg/L, the water system must begin quarterly monitoring in the second quarter of 2007.

Effective Date of Revised MCL January 23, 2006

Surface Water Arsenic Sampling Scenario - Chart 4
Initial Monitoring Years of 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005 or 2006

First Compliance Cycle (1993 - 2001) Rule Finalized on January 23, 2001

Second 9-Year Compliance Cycle

1st Compliance Period			2nd Compliance Period			3rd Compliance Period		
2002	2003	2004	2005	2006	2007	2008	2009	2010

Effective Date of Revised MCL January 23, 2006

Sample for Arsenic In 2006.
The water system must initiate compliance monitoring no later than March 31, 2006. If the analytical results are greater than 0.010mg/L, the water system must begin quarterly monitoring in the second quarter of 2006. (April 1, 2006 - June 30, 2006).

EXHIBIT C

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
DRINKING WATER INORGANIC CHEMICAL ANALYSIS REPORT

SAMPLES TO BE TAKEN AT P.O.E ONLY

>>>>PUBLIC WATER SYSTEM INFORMATION<<<<

>>>> TO BE FILLED OUT BY SYSTEM PERSONNEL <<<<

[07-030] System ID

Dixie Water Company - Annual — System Name

[04/17/02] Sample date [14:45] Sample time (24 hr clock)

Jack Meister — Owner/Contact Person Name

Owner/Contact Fax Number

623-386-4252 — Owner/Contact Person Phone Number

SAMPLE TYPE
[X] Compliance Monitoring

SAMPLE COLLECTION POINT/ID
[X] Point of Entry# [001]

001 — SAMPLING SITE ID

FOR MCL EXCEEDANCE OR COMPOSITE TRIGGER
[ ] Original Violating Specimen Number
SAMPLE TYPE
[ ] CONFIRMATION
[ ] CONFIRMATION FOR COMPOSITE TRIGGER

INORGANIC CHEMICAL ANALYSIS

>>> TO BE FILLED OUT BY THE LABORATORY PERSONNEL <<<

Analysis Method	MCL Value	Trigger Value	Contaminant Name	Cont. Code	Test Start Date/Time	Analysis Run Date/Time	Results*	Exceeds MCL	Exceeds Trigger
200.8	0.05		Arsenic	1005		04/23/02	0.0073		
200.8	2		Barium	1010		04/23/02	0.086		
200.8	0.005		Cadmium	1015		04/23/02	<0.0005		
200.8	0.1		Chromium	1020		04/23/02	0.012		
SM4500F-C	4.0		Fluoride	1025		04/26/02	1.54		
245.2	0.002		Mercury	1035		04/29/02	<0.0002		
300.0	10	5	Nitrate (as N)	1040					
SM4500NO2B	1	0.5	Nitrite (as N)	1041	4/18/02 9:15	4/18/02 10:20	<0.01		
200.8	0.05		Selenium	1045		04/23/02	<0.0030		
200.8	0.006		Antimony	1074		04/23/02	<0.0030		
200.8	0.004		Beryllium	1075		04/23/02	<0.0005		
335.4	0.2		Cyanide (as free cyanide)	1024		04/25/02	<0.005		
200.8	0.1		Nickel	1036		04/23/02	<0.010		
200.8	0.002		Thallium	1085		04/23/02	<0.0010		
300	NO MCL		Sulfate	1055					
200.7	NO MCL		Sodium	1052		04/25/02	71		

>>>>LABORATORY INFORMATION<<<<

To be filled out by laboratory personnel

SPECIMEN NUMBER
[041702-24I]

ID Number [AZ 0/0/0/9] Name:[AQUA TECH ENVIRONMENTAL LABORATORIES, INC.

Comments: [Nitrite analyzed by Precision Analytical Laboratories Inc of Tempe, Arizona.]
[All others analyzed by Aqua Tech Environmental Laboratories of Marion, OH.]

Authorized Signature:[R Mosher]

Date Public Water System Notified: [ ]

*All units must be reported in milligrams per liter (mg/l)

MAP2002

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
DRINKING WATER INORGANIC CHEMICAL ANALYSIS REPORT
*** SAMPLES TO BE TAKEN AT P.O.E. ONLY***
>>>> PUBLIC WATER SYSTEM INFORMATION <<<<
>>>> TO BE FILLED OUT BY SYSTEM PERSONNEL <<<<

ORIGINAL SENT TO ADEQ

07-733 WPE #6 Water Utilities of GreaterTonopah
System ID System Name

06/03/2004 13:00 (24 hr clock)
Sample date Sample time

Jack Meister
Owner / Contact Person Name

623-386-6638
Owner / Contact Fax Number

623-386-4252
Owner / Contact Person Phone Number

SAMPLE TYPE
☑ Compliance Monitoring

SAMPLE COLLECTION POINT/ID
☑ Point of Entry# 001

07-733-001 (Treated Water)
SAMPLE SITE ID

FOR MCL EXCEEDANCE OR COMPOSITE TRIGGER

Original Violating Specimen Number
SAMPLE TYPE
☐ CONFIRMATION
☐ CONFIRMATION FOR COMPOSITE TRIGGER

*** INORGANIC CHEMICAL ANALYSIS ***

To be filled out by laboratory personnel

Analysis Method	MCL Value	Trigger Value	Contaminant Name	Cont. Code	Test Start Date/Time	Analysis Run Date/Time	Results *	Exceeds MCL	Exceeds Trigger
EPA 200.9	0.05		Arsenic	1005		06/14/2004 00:00	<0.002	☐	
	2		Barium	1010				☐	
	0.005		Cadmium	1015				☐	
	0.1		Chromium	1020				☐	
SM 4500-FC	4.0		Fluoride	1025		06/07/2004 16:00	1.1	☐	
	0.002		Mercury	1035				☐	
	10	5	Nitrate (as N)	1040				☐	☐
	1	0.5	Nitrite (as N)	1041				☐	☐
	0.05		Selenium	1045				☐	
	0.006		Antimony	1074				☐	
	0.004		Beryllium	1075				☐	
	0.2		Cyanide (as free cyanide)	1024				☐	
	0.1		Nickel	1036				☐	
	0.002		Thallium	1085				☐	
	No MCL		Sulfate	1055				☐	
	No MCL		Sodium	1052				☐	

0406061470011
SPECIMEN NUMBER

>>>>> LABORATORY INFORMATION <<<<<
To be filled out by laboratory personnel

ID Number AZ0004 Name: Legend Technical Services of Arizona

Comments:

Authorized Signature: Lisa Sutherland

Date Public Water System Notified:

* All units must be reported in milligrams per liter.

Aerotech Environmental Laboratories

a division of Aerotech Laboratories, Inc.

Aerotech Environmental — Analytical Report — Date: *27-Dec-05*

CLIENT:	Valencia Water Co.	**Client Sample ID:**	Garden City
Lab Order:	05121106	**Tag Number:**	
Project:	Garden City/07-037	**Collection Date:**	12/16/2005 9:10:00 AM
Lab ID:	05121106-01B	**Matrix:**	

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
ICP/MS METALS, TOTAL RECOVERABLE		E200.8				Analyst: HK
Arsenic	0.0051	0.0010		mg/L	1	12/21/2005 7:00:38 AM

Footnotes: All analysis performed at AEL Phoenix laboratory unless indicated by footnotes.
(1) AEL - Tucson Laboratory
(2) AEL - Knudsen Laboratory

(3) The holding time for pH analysis is immediate. For the most accurate result, the pH should be taken in the field within 15 minutes of sampling.

■ Main Laboratory: 4645 E. Cotton Center Boulevard, Building 3, Suite 189 Phoenix, AZ 85040 Phone: 602.437.3340 Toll Free: 866.772.5227 Fax: 623.445.6192 www.aerotechlabs.com
■ Tucson Facility: 4455 S. Park Ave. Ste. 110 Tucson, AZ 85714 Phone: 520.807.3801 Fax: 520.807.3803
■ Corporate Address: 1501 W. Knudsen Drive, Phoenix, Arizona 85027 Phone: 623.780.4800 Toll Free: 800.651.4802 Fax: 623.780.7695 www.aerotechlabs.com

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
DRINKING WATER INORGANIC CHEMICAL ANALYSIS REPORT

SAMPLES TO BE TAKEN AT P.O.E ONLY

>>>>PUBLIC WATER SYSTEM INFORMATION<<<<

>>>> TO BE FILLED OUT BY SYSTEM PERSONNEL <<<<

[07-071] System ID

SUNSHINE WATER SYSTEM - ANNUAL — System Name

[08/26/03] Sample date [14:30] (24 hr clock) Sample time

ROBERT LAKE — Owner/Contact Person Name

623-386-4252 — Owner/Contact Person Phone Number

Owner/Contact Fax Number

SAMPLE TYPE

[X] Compliance Monitoring

SAMPLE COLLECTION POINT/ID

[X] Point of Entry# [001]

001 — SAMPLING SITE ID

FOR MCL EXCEEDANCE OR COMPOSITE TRIGGER

[ ] Original Violating Specimen Number

SAMPLE TYPE

[ ] CONFIRMATION

[ ] CONFIRMATION FOR COMPOSITE TRIGGER

INORGANIC CHEMICAL ANALYSIS

>>> TO BE FILLED OUT BY THE LABORATORY PERSONNEL <<<

Analysis Method	MCL Value	Trigger Value	Contaminant Name	Cont. Code	Test Start Date/Time	Analysis Run Date/Time	Results*	Exceeds MCL	Exceeds Trigger
200.8	0.05		Arsenic	1005		09/02/03	0.011		
200.8	2		Barium	1010		09/02/03	0.036		
200.8	0.005		Cadmium	1015		09/02/03	<0.0005		
200.8	0.1		Chromium	1020		09/02/03	0.02		
SM4500F-C	4.0		Fluoride	1025		08/29/03	1.73		
245.2	0.002		Mercury	1035		09/03/03	<0.0002		
300.0	10	5	Nitrate (as N)	1040					
SM4500NO2B	1	0.5	Nitrite (as N)	1041	8/27/03 16:30	8/27/03 16:45	<0.01		
200.8	0.05		Selenium	1045		09/02/03	<0.003		
200.8	0.006		Antimony	1074		09/02/03	<0.0030		
200.8	0.004		Beryllium	1075		09/02/03	<0.0005		
335.4	0.2		Cyanide (as free cyanide)	1024		09/04/03	<0.005		
200.8	0.1		Nickel	1036		09/02/03	<0.010		
200.8	0.002		Thallium	1085		09/02/03	<0.0010		
300	NO MCL		Sulfate	1055					
200.7	NO MCL		Sodium	1052		09/08/03	72		

>>>>LABORATORY INFORMATION<<<<

To be filled out by laboratory personnel

SPECIMEN NUMBER

[082703-03I]

ID Number [AZ 0/0/0/9] Name:[AQUA TECH ENVIRONMENTAL LABORATORIES, INC.

Comments: [Nitrite analyzed by Precision Analytical, Tempe, AZ]

[All others analyzed by Aqua Tech Environmental Laboratories of Marion, OH]

Authorized Signature:[R Mosher]

Date Public Water System Notified: [ ]

*All units must be reported in milligrams per liter (mg/l)

MAP2003

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

DRINKING WATER INORGANIC CHEMICAL ANALYSIS REPORT

SAMPLES TO BE TAKEN AT P.O.E ONLY

>>>> PUBLIC WATER SYSTEM INFORMATION <<<<

>>>>TO BE FILLED OUT BY SYSTEM PERSONNEL<<<< MAP 2004

[07618] System ID — B & D Water System — System Name

[03/02/04 09:53] (24 hr clock) Sample Date Sample time — John Mihlik — Owner/Contact Person Name

Owner/Contact Fax Number — 602 224 0711 — Owner/Contact Person Phone Number

SAMPLE TYPE

[x] Compliance Monitoring

SAMPLE COLLECTION POINT/ID

[x] Point of Entry# [001]

POE 001 — SAMPLING SITE ID

FOR MCL EXCEEDANCE OR COMPOSITE TRIGGE

[ ] Original Violating Specimen Number

SAMPLE TYPE

[ ] CONFIRMATION

[ ] CONFIRMATION FOR COMPOSITE TRIGGER

*** INORGANIC CHEMICAL ANALYSIS ***

To be filled out by laboratory personnel

Analy Method	MCL Value	Trigger Value	Contaminant Name	Cont. Code	Test Start Date/Time	Analysis Run Date/Time	Results*	Exceeds MCL	Exceeds Trigg
200.8	0.050		Arsenic	1005		03/09/04 14:07	0.012	[ ]	[ ]
200.8	2		Barium	1010		03/09/04 14:07	0.039	[ ]	[ ]
200.8	0.005		Cadmium	1015		03/09/04 14:07	< 0.0005	[ ]	[ ]
200.8	0.1		Chromium	1020		03/09/04 14:07	0.024	[ ]	[ ]
4500F-C	4.0		Fluoride	1025		03/10/04	2.8	[ ]	[ ]
245.1	0.002		Mercury	1035		03/08/04 17:13	< 0.0002	[ ]	[ ]
	10	5	Nitrate (as N)	1040				[ ]	[ ]
300.0	1	0.5	Nitrite (as N)	1041		03/03/04 23:33	< 0.1	[ ]	[ ]
200.8	0.05		Selenium	1045		03/09/04 14:07	< 0.005	[ ]	[ ]
200.8	0.006		Antimony	1074		03/09/04 14:07	< 0.001	[ ]	[ ]
200.8	0.004		Beryllium	1075		03/09/04 14:07	< 0.001	[ ]	[ ]
4500CN-F	0.2		Cyanide (as free)	1024		03/09/04	< 0.03	[ ]	[ ]
200.8	0.1		Nickel	1036		03/09/04 14:07	< 0.005	[ ]	[ ]
200.8	0.002		Thallium	1085		03/09/04 14:07	< 0.001	[ ]	[ ]
	No MCL		Sulfate	1055				[ ]	[ ]
200.7	No MCL		Sodium	1052		03/04/04 21:43	70	[ ]	[ ]

>>>>> LABORATORY INFORMATION <<<<<

To be filled out by laboratory personnel

SPECIMEN NUMBER

[24030201291]

ID Number [AZ0/4/5/5] Name: [Montgomery Watson Laboratories]

Comments: [122960-24030201291]

Authorized Signature: [ ]

Date Public Water System Notified: [ ]

* All units must be reported in milligrams per liter (mg/l)

DWAR2: REVISED 05/08/98 Page 1 of 1

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
DRINKING WATER INORGANIC CHEMICAL ANALYSIS REPORT

SAMPLES TO BE TAKEN AT P.O.E ONLY

>>>>PUBLIC WATER SYSTEM INFORMATION<<<<

>>>> TO BE FILLED OUT BY SYSTEM PERSONNEL <<<<

[07-706] System ID

BUCKEYE RANCH - ANNUAL — System Name

[08/26/03] Sample date [8:45] (24 hr clock) Sample time

UNKNOWN — Owner/Contact Person Name

Owner/Contact Fax Number

623-386-4252 — Owner/Contact Person Phone Number

SAMPLE TYPE
[X] Compliance Monitoring

SAMPLE COLLECTION POINT/ID
[X] Point of Entry# [001]

001 — SAMPLING SITE ID

FOR MCL EXCEEDANCE OR COMPOSITE TRIGGER
[ ] Original Violating Specimen Number
SAMPLE TYPE
[ ] CONFIRMATION
[ ] CONFIRMATION FOR COMPOSITE TRIGGER

INORGANIC CHEMICAL ANALYSIS
>>> TO BE FILLED OUT BY THE LABORATORY PERSONNEL <<<

Analysis Method	MCL Value	Trigger Value	Contaminant Name	Cont. Code	Test Start Date/Time	Analysis Run Date/Time	Results*	Exceeds MCL	Exceeds Trigger
200.8	0.05		Arsenic	1005		09/02/03	0.013 –		
200.8	2		Barium	1010		09/02/03	0.049		
200.8	0.005		Cadmium	1015		09/02/03	<0.0005		
200.8	0.1		Chromium	1020		09/02/03	0.028		
SM4500F-C	4.0		Fluoride	1025		08/29/03	3.19 –		
245.2	0.002		Mercury	1035		09/03/03	<0.0002		
300.0	10	5	Nitrate (as N)	1040					
SM4500NO2B	1	0.5	Nitrite (as N)	1041	8/27/03 16:30	8/27/03 16:45	<0.01		
200.8	0.05		Selenium	1045		09/02/03	0.0039		
200.8	0.006		Antimony	1074		09/02/03	<0.0030		
200.8	0.004		Beryllium	1075		09/02/03	<0.0005		
335.4	0.2		Cyanide (as free cyanide)	1024		09/04/03	<0.005		
200.8	0.1		Nickel	1036		09/02/03	<0.010		
200.8	0.002		Thallium	1085		09/02/03	<0.0010		
300	NO MCL		Sulfate	1055					
200.7	NO MCL		Sodium	1052		09/08/03	74		

>>>>LABORATORY INFORMATION<<<<

To be filled out by laboratory personnel

SPECIMEN NUMBER
[082703-08I]

ID Number [AZ 0/0/0/9] Name:[AQUA TECH ENVIRONMENTAL LABORATORIES, INC.

Comments: [Nitrite analyzed by Precision Analytical, Tempe, AZ]
[All others analyzed by Aqua Tech Environmental Laboratories of Marion, OH]

Authorized Signature:[R Mosher]

Date Public Water System Notified: [ ]

*All units must be reported in milligrams per liter (mg/l)

MAP2003

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
DRINKING WATER INORGANIC CHEMICAL ANALYSIS REPORT

SAMPLES TO BE TAKEN AT P.O.E ONLY

>>>>PUBLIC WATER SYSTEM INFORMATION<<<<

>>>> TO BE FILLED OUT BY SYSTEM PERSONNEL <<<<

[07-082] System ID

[Roseview Water System - Annual] System Name

[04/17/02] Sample date [12:00] (24 hr clock) Sample time

[Jack Meister] Owner/Contact Person Name

[ ] Owner/Contact Fax Number

[623-386-4252] Owner/Contact Person Phone Number

SAMPLE TYPE
[X] Compliance Monitoring

SAMPLE COLLECTION POINT/ID
[X] Point of Entry# [001]

001
SAMPLING SITE ID

FOR MCL EXCEEDANCE OR COMPOSITE TRIGGER
[ ] Original Violating Specimen Number
SAMPLE TYPE
[ ] CONFIRMATION
[ ] CONFIRMATION FOR COMPOSITE TRIGGER

INORGANIC CHEMICAL ANALYSIS

>>> TO BE FILLED OUT BY THE LABORATORY PERSONNEL <<<

Analysis Method	MCL Value	Trigger Value	Contaminant Name	Cont. Code	Test Start Date/Time	Analysis Run Date/Time	Results*	Exceeds MCL	Exceed Trigger
200.8	0.05		Arsenic	1005		04/23/02	0.024		
200.8	2		Barium	1010		04/23/02	<0.010		
200.8	0.005		Cadmium	1015		04/23/02	<0.0005		
200.8	0.1		Chromium	1020		04/23/02	0.025		
SM4500F-C	4.0		Fluoride	1025		04/26/02	3.35		
245.2	0.002		Mercury	1035		04/29/02	<0.0002		
300.0	10	5	Nitrate (as N)	1040					
SM4500NO2B	1	0.5	Nitrite (as N)	1041	4/18/02 9:15	4/18/02 10:20	<0.01		
200.8	0.05		Selenium	1045		04/23/02	0.0043		
200.8	0.006		Antimony	1074		04/23/02	<0.0030		
200.8	0.004		Beryllium	1075		04/23/02	<0.0005		
335.4	0.2		Cyanide (as free cyanide)	1024		04/25/02	<0.005		
200.8	0.1		Nickel	1036		04/23/02	<0.010		
200.8	0.002		Thallium	1085		04/23/02	<0.0010		
300	NO MCL		Sulfate	1055					
200.7	NO MCL		Sodium	1052		04/25/02	190		

>>>>LABORATORY INFORMATION<<<<

To be filled out by laboratory personnel

SPECIMEN NUMBER
[041702-22I]

ID Number [AZ 0/0/0/9] Name:[AQUA TECH ENVIRONMENTAL LABORATORIES, INC.]
Comments: [Nitrite analyzed by Precision Analytical Laboratories Inc of Tempe, Arizona.]
[All others analyzed by Aqua Tech Environmental Laboratories of Marion, OH.]
Authorized Signature: [R Mosher]
Date Public Water System Notified: [ ]
*All units must be reported in milligrams per liter (mg/l)

MAP2002